

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LONG ISLAND NEUROSURGICAL ASSOCIATES
P.C.,

18-cv-06829

Plaintiff,

-against-

1199 SEIU NATIONAL BENEFIT FUND,

Defendant.

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ANSWER

Defendant 1199SEIU National Benefit Fund (the “Fund”) as and for its answer to the
Complaint of Plaintiff submits:

1. Defendant denies information sufficient to form a belief as to the truth of the
allegation set forth in Paragraphs 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 21,
23,24,25. 26,27, 28, 29, 31, 37, 39, 43,48, and 49.
2. Deny 17, 18, 19, 20, 30, 34,35, 36, 38, 40, 42, 44, 46, 50, 52, 53, and 54.

AFFIRMATIVE DEFENSES

1. Plaintiff has failed to state a claim for relief.
2. Plaintiff’s claims are preempted.
3. Plaintiff has failed to exhaust its administrative remedies.

Dated: New York, New York

December 14, 2018

1199SEIU National Benefit Fund

By: /s/

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